

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

SECURITIES AND EXCHANGE COMMISSION,)	
)	
)	
Plaintiff,)	
v.)	No. 19-CV-12127-WGY
)	
SHUANG CHEN, et al.,)	
)	
)	
Defendants.)	
)	
WEIGUO GUAN et al.,)	
)	
)	
Relief Defendants.)	
)	

**PLAINTIFF’S MOTION FOR DEFAULT JUDGMENTS
AGAINST CERTAIN DEFENDANTS AND RELIEF DEFENDANTS**

Pursuant to Fed. R. Civ. P. 55(b)(2), plaintiff Securities and Exchange Commission (“the Commission”) hereby moves for the entry default judgments as to defendants Shuang Chen, Wenwen Du, Lirong Gao, Jing Guan, Tonghui Jia, Xuejie Jia, Honglei Shi, Lujun Sun, Huailong Wang, Jiadong Wang, Jiafeng Wang, Linlin Wu, Lin Xing, Yong Yang, Jiancheng Zhao, and Forrest (HK) Co., Limited (collectively, the “Defaulting Defendants”) and defaulting relief defendants Weiguo Guan, Song Geng, Jinquan Liu, Rishan Liu, Qinhua Ren, Jixiang Teng, Weigang Yang, Xiangjia Yang, Xiuchun Zhang, Jingru Zhai, and WV Forrest Investments LLC (collectively, the “Defaulting Relief Defendants”).

In support of this motion, the Commission submits the accompanying memorandum of law and the attached declarations of Eugene Canjels and Sofia Hussain. The Commission also incorporates by reference the Declaration of Sofia Hussain and related Exhibits, the Declaration of Kenneth Zavos, and the Declaration of Scott Walster and related appendices, which were filed

with the Court on October 15, 2019, in support of the Commission's Motion for a Temporary Restraining Order, Order Freezing Assets, and Order for Other Equitable Relief, see Dkt. Nos. 5, 6, and 7, and the Declaration of Sofia Hussain, the Declaration of Kenneth Zavos, and the Declaration of Scott Walster and related appendices, which were filed with the court on December 23, 2019, in support of the Commission's Motion to Amend the Preliminary Injunction, see Dkt. No. 75, Exhibits 2, 3, and 4.

WHEREFORE, the Commission respectfully requests that the Court enter the proposed Final Judgments in the forms attached hereto against each of the Defaulting Defendants and Defaulting Relief Defendants.

By its attorneys,

/s/ Andrew Palid

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SECURITIES AND EXCHANGE COMMISSION

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Dated: November 1, 2021

Certificate of Service

I, Andrew Palid, certify that on November 1, 2021, a true and correct copy of Plaintiff's Motion for Default Judgments Against Certain Defendants and Relief Defendants was filed through the Court's CM/ECF system and, accordingly, the document will be sent electronically to the registered participants as identified on the Notice of Electronic Filing. In addition, unrepresented defendants and relief defendants will be promptly served by email at addresses attributed to them.

/s/ Andrew Palid

Andrew Palid